



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI
GOVERNOR

DAVID P. LITTELL
COMMISSIONER

Stratton Lumber, Inc.)	Departmental
Franklin County)	Findings of Fact and Order
Stratton, Maine)	Air Emission License
A-9-71-N-M (SM))	Minor Revision

After review of the air emissions license amendment application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., Section 344 and Section 590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

Stratton Lumber, Inc. (Stratton Lumber) of Stratton, Maine was issued Air Emission License A-9-71-M-R/A on March 27, 2008 for the operation of emission sources associated with their lumber mill. Stratton Lumber has requested a minor revision to reduce the kilns' throughput.

II. APPLICATION CLASSIFICATION

Stratton Lumber's application was submitted pursuant to the minor revision procedures in 06-096 CMR 115. The application for Stratton Lumber does not violate any applicable federal or state requirements and does not reduce monitoring, reporting, testing or record keeping. This amendment will not increase licensed allowable or actual emissions of any pollutant. Therefore, this modification is determined to be a minor revision (emission increase of less than 4 tons/year for each single pollutant and less than 8 tons/per year for all pollutants combined) under 06-096 CMR 115 and has been processed as such. As a result of this request to restrict kiln production, licensed allowed emissions will be below Major Source thresholds and thereby become a synthetic minor.

III. REVISION DESCRIPTION

Throughput Restriction

Stratton Lumber is licensed through A-9-71-M-R/A to operate fuel burning and process equipment associated with its lumber mill operations. Stratton's main

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licensed equipment is a 22.5 MMBtu/hr wood-fired boiler and three (3) lumber drying kilns. Stratton Lumber has requested that the restriction of the kilns' throughput of spruce and fir contained in Specific Condition (17) A of air emissions license A-9-71-M-R/A be changed from 120 million board feet (MMBF) to 90 MMBF. In addition, Stratton has requested to reduce fir drying contained in Condition (17) B from 35 MMBF to 25 MMBF.

Prior to the air emission license renewal and amendment in 2008, Stratton Lumber had a license restriction of 90 MMBF/yr of spruce and fir combined and 25 MMBF/yr of fir for lumber drying to maintain potential VOC emissions less than 50 tons per year and maintain minor source status. Stratton subsequently modernized the mill which included improvements in the log handling and feed-in systems allowing an increase in the kilns' lumber drying capacity as currently licensed. However, Stratton Lumber has not produced more than 90 MMBF of lumber per year and does not anticipate production to exceed 90 MMBF/yr in the foreseeable future.

Therefore, using the emission factors established in the air emissions license and going back to the original license restriction of 90 MMBF/yr, Stratton Lumber is considered a minor source and will not need to submit an application for a Part 70 Air Emissions License. Currently Condition (18) of the facility's air emissions license states:

- (18) As a result of the increased potential annual VOC emissions, Stratton will become a major source of VOC emissions as defined in 06-096 CMR 100 and Stratton shall be required to submit an initial Part 70 Air Emission License application by November 1, 2009. [06-096 CMR 100, 06-096 CMR 115, 06-096 CMR 140]

This minor revision will remove Condition (18) and the annual licensed allowed emissions will be adjusted as follows:

Annual Emission Restrictions

Stratton Lumber, Inc. is assessed fees based on the following annual emissions, based on a twelve-month rolling total:

- Boiler #1 emission potentials are calculated based on continuous year round operation.

Total Licensed Allowed Annual Emissions for the Facility

Pollutant	Tons/Year		
	Boiler	Kilns	Total
PM	29.6	-	29.6
PM ₁₀	29.6	-	29.6
SO ₂	2.0	-	2.0
NO _x	21.7	-	21.7
CO	98.6	-	98.6
VOC	9.9	39.3	49.2

This minor revision will not increase actual or licensed allowed emissions. Therefore, based on the information provided by Stratton Lumber, this minor revision will restrict drying lumber throughput and thereby reduce licensed allowed emissions below major source levels.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards,
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License A-9-71-N-M subject to the conditions found in Air Emission License A-9-71-M-R/A and in the following conditions:

SPECIFIC CONDITIONS

(1) The following condition shall replace Condition (17) in Air Emission License A-9-71-M-R/A:

(17) Drying Kilns

- A. Stratton shall be limited to drying 90 MMBF/yr of spruce and fir at their Stratton, Maine facility based on a twelve-month rolling total.
[06-096 CMR 115, BPT]

Stratton Lumber, Inc.
Franklin County
Stratton, Maine
A-9-71-N-M (SM)

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4

**Departmental
Findings of Fact and Order
Air Emission License
Minor Revision**

- B. Stratton shall be limited to drying no more than 25.0 MMBF/yr of fir at their Stratton, Maine facility based on a twelve-month rolling total.
[06-096 CMR 115, BPT]
- C. Stratton shall maintain a record of wood drying. The record shall include the quantity of wood dried and indicating the species of wood dried. The record shall be maintained on a monthly as well as a twelve-month rolling total.
[06-096 CMR 115, BPT]
- D. Prior to drying any other species of wood in the kilns, Stratton Lumber, Inc. shall contact the Department to assess whether any modifications need to be made to this air emission license. [06-096 CMR 115, BPT]

(2) Condition (18) in Air Emission License A-9-71-M-R/A is removed.

DONE AND DATED IN AUGUSTA, MAINE THIS 2ND DAY OF November, 2009.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: James P. Brookfield
DAVID P. LITTELL, COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-9-71-M-R/A.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: September 22, 2009
Date of application acceptance: October 14, 2009

Date filed with the Board of Environmental Protection: _____

This Order prepared by Edwin Cousins, Bureau of Air Quality.

